


PLEASE TAKE NOTICE, that Defendant, AGROCORP INTERNATIONAL PTE. LTD., (hereinafter "AGROCORP"), by and through its attorneys, CHALOS, O'CONNOR & DUFFY, LLP, upon the annexed Memorandum of Law dated September 18, 2007, and the pleadings and proceedings heretofore had herein, will move this Court before the Honorable Colleen McMahon at the United States District Court, 500 Pearl Street, New York, New York, at a time and date to be set by the Court upon the completion of the submission of all papers in connection with this motion, for an Order vacating the

September 4, 2007 Order and for an Order vacating the Process of Maritime Attachment in this matter and dismissing the Complaint, and for such other and further relief as the Court may deem just and proper.

Dated: Port Washington, New York  
September 18, 2007

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